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Attorney for Defendants,
COUNTY OF STANISLAUS

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

R.S., a minor, by and through his guardian ad
litem Jessica Moreno, individually and as
successor in interest to Rudy Santillan, Sr.,
deceased, and JORGE VICENTE,
individually,

Plaintiffs,

v.

County of Stanislaus; Dany Anderson; Miguel
Garcia; Eric Torres; Dustin Willey; Alberto
Navarro; Eric Garcia; Benjamin Carnes; Barry
Balance; Morin Yom; Colton Hughes; Robert
Domingos and DOES 1-20 10, inclusive,

Defendants.

) CASE NO.: 1:20-cv-01170-DAD-SKO
)
) **STIPULATION and ORDER FOR AN**
) **EXTENSION OF TIME TO FILE A**
) **RESPONSIVE PLEADING**
)
) **[E.D. Cal. L.R. 144(a)]**
)
) **(Doc. 10.)**

1 Plaintiffs, by and through their counsel Dale K. Galipo, Esq. and Renee Masongsong,
2 Esq. of the Law Offices of Dale K. Galipo and Jaime A. Leanos of the Law Office of Morales &
3 Leanos and Defendant County of Stanislaus, by and through counsel Shanan L. Hewitt, Esq. and
4 Jonathan B. Paul, Esq. of the Law Offices of Rivera Hewitt Paul LLP, hereby stipulate pursuant
5 to Local Rule of Court 144(a) to an extension of time in order to permit Defendants to file a
6 responsive pleading to Plaintiffs' Complaint for Damages (Doc. 1) filed on August 19, 2020, in
7 accordance with the pleading requirements of the Federal Rules of Civil Procedure. The parties
8 stipulate and have agreed to extend the responsive pleading deadline follows:

9 (1) Defendants, including the COUNTY OF STANISLAUS was served with this lawsuit on
10 or about October 1, 2020.

11 (2) The undersigned defense counsel was contacted on October 1, 2020 regarding possible
12 representation of COUNTY OF STANISLAUS, DANNY ANDERSON, MIGUEL
13 GARCIA, ERIC TORRES, DUSTIN WILLEY, ALBERTO NAVARRO, ERIC
14 GARCIA, BENJAMIN CARNES, BARRY BALANCE, MORIN YOM, COLTON
15 HUGHES, and ROBERT DOMINGOS. After conducting a conflict check, defense
16 counsel accepted the assignment, but to date is still awaiting case-related materials from
17 the Stanislaus County Sheriff's Department and will need to communicate with all
18 individual Deputy Defendants involved in the incident at issue in order to determine if
19 joint representation is feasible and in order to properly prepare a responsive pleading to
20 the Complaint (Doc. 1).

21 (3) Under these circumstances, the parties have agreed and hereby stipulate to extend the
22 time for Defendants COUNTY OF STANISLAUS, et al. to respond to the Complaint
23 (Doc. 1) from the original responsive pleading due date of October 22, 2020 to the agreed
24 upon date of November 19, 2020 and further have agreed that the Mandatory Scheduling
25 Conference currently set for November 10, 2020 should likewise be continued by the
26 Court.

27 IT IS SO STIPULATED.

28 ///

1 Dated: October 8, 2020

LAW OFFICES OF DALE K. GALIPO

2
3 /s/ Dale K. Galipo
4 DALE K. GALIPO
5 RENEE MASONGSONG
6 Attorneys for Plaintiffs

7 Dated: October 8, 2020

MORALES & LEANOS

8 /s/ Jaime Leanos
9 JAIME LEANOS
10 Attorneys for Plaintiffs

11 Dated: October 8, 2020

RIVERA HEWITT PAUL LLP

12 /s/ Jonathan B. Paul
13 SHANAN L. HEWITT
14 JONATHAN B. PAUL
15 Attorneys for Defendant
16 County of Stanislaus

17
18
19 **ORDER**

20
21
22 GOOD CAUSE having been shown, the foregoing stipulated request for an extension of
23 time for Defendants COUNTY OF STANISLAUS, et al. to file a responsive pleading to
24 Plaintiffs' Complaint (Doc. 1) is HEREBY GRANTED. Defendants COUNTY OF
25 STANISLAUS, et al., shall file and serve their responsive pleading to Plaintiffs' Complaint no
26 later than November 19, 2020.

27 Based on the foregoing, the Mandatory Scheduling Conference currently set for October
28 27, 2020, will be CONTINUED to **January 7, 2021, at 10:15 a.m.** before Magistrate Judge

1 Sheila K. Oberto. The parties SHALL file their joint scheduling report by no later than
2 December 31, 2020.

3
4 IT IS SO ORDERED.

5 Dated: October 9, 2020

/s/ Sheila K. Oberto
6 UNITED STATES MAGISTRATE JUDGE